

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No.
	)	
APPROXIMATELY ONE HUNDRED	)	
NINE THOUSAND, ONE HUNDRED	)	
AND NINTY DOLLARS (\$109,190.00)	)	
U.S. CURRENCY, AND	)	
	)	
APPROXIMATELY SEVEN THOUSAND,	)	
SEVEN HUNDRED EIGHTY DOLLARS	)	
(\$7,780.00) U.S. CURRENCY,	)	
	)	
Defendants.	)	

**VERIFIED COMPLAINT OF FORFEITURE**

Comes now plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this *in rem* civil action the United States seeks forfeiture of certain property, currently in the possession and custody of the plaintiff pursuant to the provisions of Title 21, United States Code, Section 881.
2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), Title 18, United States Code, Section 981, and Title 21, United States Code, Section 881. *In Rem* jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Section 1355 & 1395 and Title 21, United States Code, Section 881(j).

3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code, Section 801 et seq., was proceeds traceable to such an exchange, and was used or intended to be used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was criminally derived property involved in monetary and / or financial transactions to promote unlawful activity and conceal or disguise the nature, location, source, ownership, control of the proceeds in violation of Title 18, United States Code, Sections 1956 and 1957. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Sections 881(a)(4) and 881(a)(6) and Title 18, United States Code, Section 981(a)(1)(A).

5. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

6. On or about September 25, 2013, the defendant currency \$109,190.00 and \$7,780.00 was seized from Charles Wolfe by the U.S. Customs and Border Protection. The plaintiff alleges the defendant property is subject to forfeiture and for its reasons states as follows:

7. A joint investigation conducted by the United States Custom and Border Protection, the Internal Revenue Service and the Drug Enforcement Administration have identified several individuals involved in the manufacture and distribution of synthetic drugs in and around the St. Louis metropolitan area. During this investigation, investigators identified Charles Wolfe as a member of the distribution organization.

8. Investigators have utilized source information, law enforcement surveillance operations, statements made by individuals as part of this investigation, and other investigative procedures to identify the extent of Wolfe's involvement in the drug trafficking enterprise.

9. Pursuant to information obtained during the investigation, on or about September 25, 2013, a federal search warrant was executed at the residence of Wolfe located at 1901 Williamstown Drive, St. Peters, Missouri. During the search agents discovered and seized multiple items, including but not limited to: \$109,190.00 U.S. Currency, miscellaneous documents, three computers, two tablets, one cellphone and one packet of *MEGA KUSH*, suspected to be synthetic marijuana.

10. Pursuant to information obtained during the investigation, on or about September 25, 2013, a federal search warrant was executed at a business office used by Wolfe located at 13765 St. Charles Rock Road, Suite 101 and 102, Bridgeton, Missouri. During the search agents discovered and seized multiple items, including but not limited to: \$7,780.00 U.S. Currency and approximately twenty-one packets containing a leafy, vegetable like substance, suspected to be synthetic marijuana.

11. On May 21, 2014, Charles Wolfe was indicted in cause number 4:14CR00152 RWS. On June 5, 2014, Charles Wolfe was also indicted in cause number 4:14CR00175 AGF. Both cases involve charges to possess with the intent to distribute Schedule 1 controlled substance and Schedule I controlled substance analogues for human consumption, in violation of Title 21, United States Code, Sections 841(a)(1) and 813. Included in each indictment is a forfeiture allegation that seeks criminal forfeiture of the \$109,190.00 and \$7,780.00 that is the subject of this case and all property, real or personal, subject to forfeiture for said offenses.

12. The only people known to have a possible interest in the defendant property are Charles Wolfe and Dean Graver.

13. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 18, United States Code, section 981 and Title 21, United States Code, Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant property and the defendant property be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Dated: February 2, 2015

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

/s/ Jennifer A. Winfield  
AUSA Jennifer A. Winfield, #53350MO  
Assistant United States Attorney  
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(314) 539-2200

DECLARATION

I, Jennifer A. Winfield, declare under penalty of perjury, pursuant to Title 28, United States Code, Section 1746, that the foregoing Complaint for Forfeiture is based upon reports and information furnished to me and that the contents therein are true and correct to the best of my knowledge and belief. Executed on the 2nd day of February, 2015.

  
AUSA Jennifer A. Winfield, #53350MO  
Assistant United States Attorney